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June 30, 2014

Mr. Gerard Poliquin  
Secretary of the Board  
NCUA  
1775 Duke St.  
Alexandria, VA 22314-3428

Re: Comments on Proposed Rulemaking Regarding Associational Common Bond

Dear Mr. Poliquin,

Thank you for giving the Big Spring Education Employees FCU the opportunity to comment on the notice of proposed rulemaking on the National Credit Union Administration's Chartering and Field of Membership Manual specifically the proposed amendments regarding the associational common bond provisions applicable to federal credit unions.

BSEEFUCU agrees that existing associations should be grandfathered and not subject to review. Through an NCUA approved merger in 1984, BSEEFUCU assumed Col-Tex Credit Union and was put in a unique situation. It now had both a limited field of membership and a community charter. BSEEFUCU's branch office in Colorado City is open to any resident in Mitchell County while its main office has an associational membership open to education employees and their direct family members. BSEEFUCU is a small credit union and this rule would have a significant impact on the credit union if it were forced to remove the community charter at its branch location.

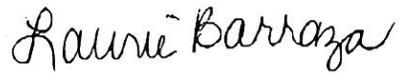
Living in a rural community means that the majority of the schools BSEEFUCU serves or could serve are not within NCUA's interpretation of "reasonable proximity" which is 25 miles. BSEEFUCU has concerns it may encounter future obstacles in adding other schools to its membership because of geographical limitations. Given the nature of this electronic and digital age, BSEEFUCU is asking that NCUA revise or expand its interpretation of "reasonable proximity".

BSEEFUCU also supports aspects of the rule that give credit unions regulatory relief such as the automatic approval of certain associations.

BSEEFUCU is concerned that NCUA's reaction based on a few credit union's actions may cause undue hardship to all credit unions.

Thank you for the opportunity to comment on this important proposal.

Sincerely,

A handwritten signature in cursive script that reads "Laurie Barraza".

Laurie Barraza  
Vice President